

## **APCO** International

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS INTERNATIONAL, INC.

October 12, 2005

ACTING EXECUTIVE DIRECTOR E. Tim Ryan, C.P.A.

ryant@apcointl.org

APCO INTERNATIONAL

351 N. Williamson Boulevard Daytona Beach, FL. 32114-1112 Phone: 888-APCO911 OR 386-322-2500

www.apcointl.org

OFFICE OF GOVERNMENT AFFAIRS

1725 DeSales Street, N.W., Suite 808 Washington, D.C. 20036 Phone: 202-833-2700 dcoffice@apco911.org

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Gregory S. Ballentine

Mid America Regional Council 600 Broadway 300 Rivergate Center Kansas City, MO 64105-1554 Phone: 816-474-4240 president@apco911.org

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Tarrant County 911 District 100 East 15<sup>th</sup> Street Fort Worth, TX 76102

Phone: 817-820-1185 pres-elect@apco911.org

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Shreveport Fire Department 1144 Texas Avenue Shreveport, LA 71101 Phone: 318-675-2200 first-vp@apco911.org

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Manfred Blaha

Republic of Austria Federal Ministry of the Interior Hohenbergstrasse 1 A-1120 Vienna

Phone: +43 – 1 53126-6251 manfred.blaha@aon.at

The Honorable Kevin J. Martin Chairman Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

RE: WC Docket No. 04-36; WC Docket 05-196

Dear Mr. Chairman:

APCO International strongly supports the Commission's ongoing efforts to ensure that VoIP services provide 9-1-1 capability across the nation by November 28. As VoIP services proliferate, it is essential that they provide their customers with the ability to call 9-1-1 and reach a trained call-taker at the appropriate PSAP.

On October 7, AT&T submitted a letter to the Commission outlining its plans to comply with the FCC requirements for its VoIP service offering. APCO International supports AT&T's proactive solution. We are particularly pleased that AT&T has agreed not to offer new VoIP services, and to block "nomadic" service, in areas in which it does not have 9-1-1 capability. The AT&T plan also includes incentives for it to expand 9-1-1 capability in all areas in which it currently has registered users.

We applaud the Commission's attention to this critical issue, and are pleased that AT&T is moving forward to ensure that all of its customers have 9-1-1 capability. We urge all VoIP providers to take similar steps.

Respectfully submitted,

Gregory & Ballentine

**Gregory Ballentine** 

cc: Commissioner Kathleen Abernathy
Commissioner Michael Copps

Commissioner Jonathan Adelstein

Thomas Navin, Esq.